

ALEX G. TSE (CABN 152348)  
Acting United States Attorney

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,	)	NO. CR 17-512 EMC
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
CLEVELAND MARTIN,	)	
	)	
Defendant.	)	
	)	
	)	

**STIPULATION AND ~~PROPOSED~~ ORDER TO  
CONTINUE HEARING FROM JUNE 13, 2018, TO  
JUNE 20, 2018, AND TO EXCLUDE TIME  
UNDER THE SPEED TRIAL ACT**

The parties appeared before the Court on May 16, 2018 for a status conference in the above-captioned case. The parties informed the Court that the government was in the process of obtaining additional discovery requested by the defendant. At the time, a further status was scheduled for June 13, 2018, for motion setting with respect to an anticipated defense motion to suppress.

Since the last hearing, the parties have worked together both with respect to discovery as well as with respect to a potential disposition. The parties request a brief one-week continuance until June 20, 2018, to allow for additional time for negotiations towards a pretrial resolution. Should the parties be unable to reach a joint resolution by June 20, 2018, they will be prepared to enter into a pretrial briefing schedule on that date.

1 The parties agree and jointly request that the time between June 13, 2018, and June 20, 2018,  
2 should be excluded in order to provide reasonable time necessary for the continuity and effective  
3 preparation of counsel, pursuant to 18 U.S.C. § 3161(h)(7)(B)(iv). The parties agree that the ends of  
4 justice are served by granting the continuance outweigh the best interests of the public and the defendant  
5 in a speedy trial.

6 SO STIPULATED:

7 ALEX G. TSE  
8 Acting United States Attorney

9 DATED: June 11, 2018

\_\_\_\_\_/s  
10 SAILAJA M. PAIDIPATY  
11 Assistant United States Attorney

12  
13 DATED: June 11, 2018

\_\_\_\_\_/s  
14 CLEVELAND MARTIN  
15 Attorney for Steven Kalar

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1 **~~[PROPOSED]~~ ORDER**

2 Based on the reasons provided in the stipulation of the parties above, the Court hereby FINDS  
3 that for adequate preparation of the case by all parties and continuity of counsel, and in the interest of  
4 justice, pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and (B)(iv), an exclusion of time is warranted under the  
5 Speedy Trial Act. Based on these findings, IT IS HEREBY ORDERED THAT the hearing is continued  
6 from June 13, 2018 until June 20, 2018 at 2:30 p.m., and time is excluded until June 20, 2018.

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8 DATED: 6/12/18 \_\_\_\_\_

